

Justin D. Kingsolver (AZ Bar No. 035476)  
**CROWELL & MORING LLP**  
1001 Pennsylvania Avenue, N.W.  
Washington, DC 20004  
Telephone: (202) 624-2500  
Email: [JKingsolver@crowell.com](mailto:JKingsolver@crowell.com)

*Attorney for Plaintiffs True Names, Ltd. and Virgil Griffith*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

True Names, Ltd. d/b/a Ethereum Name  
Service, a Singapore corporation, and Virgil  
Griffith, an individual

Plaintiff,

v.

GoDaddy, Inc., a Delaware corporation,  
and GoDaddy.com LLC, a Delaware  
corporation, Dynadot LLC, a California  
corporation, and Manifold Finance, Inc., a  
Delaware corporation.

Defendants.

Case No. 2:22-cv-01494-JJT

**DECLARATION OF JACOB CANTER  
REGARDING NOTICE TO  
DEFENDANTS OF THE COURT'S  
SEPTEMBER 9, 2022 ORDER**

I, Jacob Canter, declare:

1. I am a lawyer at Crowell & Moring LLP and counsel to Plaintiffs True Names, Ltd. and Virgil Griffith. The matters set forth herein are true and correct of my own personal knowledge and, if called as a witness, I could and would testify competently thereto. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

2. On September 9, 2022, the Court issued its Order on Plaintiffs' Motion for Temporary Restraining Order and Order to Show Cause for Preliminary Injunction. (Doc. No. 19.) The September 9, 2022, Order states that "Plaintiffs shall serve this Order on Defendants as soon as practicable, and in any event by September 13, 2022." (*Id.*) The

Order also states that “Plaintiffs must post a bond in the amount of \$10,000 under Federal Rule of Civil Procedure 65(c) by September 13, 2022. (*Id.*)

3. On September 9, 2022, I served the September 9, 2022, Order via email on Defendants GoDaddy, Inc., GoDaddy.com LLC, Dynadot LLC, and Manifold Finance, Inc., at the addresses: [sam@manifoldfinance.com](mailto:sam@manifoldfinance.com); [mlaul@yahoo.com](mailto:mlaul@yahoo.com); [michelelau@godaddy.com](mailto:michelelau@godaddy.com); [legal@godaddy.com](mailto:legal@godaddy.com); [courtdisputes@godaddy.com](mailto:courtdisputes@godaddy.com). I set the priority for each of the emails as “High Importance.” A true and correct copy of the emails that I sent to each of the Defendants is attached herein as **Exhibit A (Notice to Manifold Finance, Inc.); Exhibit B (Notice to GoDaddy, Inc.); Exhibit C (Notice to GoDaddy.com LLC); Exhibit D (Notice to Dynadot LLC)**.

4. On September 9, 2022, I directed a process server to serve the September 9, 2022, Order on the registered agents for each of the Defendants. A true and correct copy of the email that I sent to the process server is attached herein as **Exhibit E**.

5. On September 12, 2022, I received from the process server confirmation in the form of an affidavit that service of the Court’s September 9, 2022, Order on GoDaddy, Inc. had been completed on the registered agent site, 251 Little Falls Drive, Wilmington, DE, 19808, on September 12, 2022, at 11:24 AM EDT. A true and correct copy of the affidavit is attached herein as **Exhibit F**.

6. On September 12, 2022, I received from the process server confirmation in the form of an affidavit that service of the Court’s September 9, 2022, Order on GoDaddy.com LLC had been completed on the registered agent site, 251 Little Falls Drive, Wilmington, DE, 19808, on September 12, 2022, at 11:24 AM EDT. A true and correct copy of the affidavit is attached herein as **Exhibit G**.

7. On September 12, 2022, I received from the process server confirmation in the form of an affidavit that service of the Court’s September 9, 2022, Order on Dynadot LLC had been completed via certified mail on the registered agent site, 210 S Ellsworth Ave., #345, San Mateo, CA, 94401, on September 12, 2022, at 10:58 AM PDT. A true and correct copy of the affidavit is attached herein as **Exhibit H**.

1           8.       On September 12, 2022, I received an email communication from Alex  
2       Levit at the address [alevit@dynadot.com](mailto:alevit@dynadot.com). Mr. Levit stated in the email that he is legal  
3       counsel for Dynadot LLC and is in receipt of the complaint and September 9, 2022,  
4       Order.

5           9.       On September 11, 2022, I directed a second process server to serve the  
6       September 9, 2022, Order onto the registered agent for Manifold Finance, Inc., the home  
7       address for the CEO and registered agent of Dynadot LLC, and the registered agents for  
8       the remaining Defendants. A true and correct copy of the email that I sent to the second  
9       process server is attached herein as **Exhibit I**.

10          10.      On September 13, 2022, the second process server informed me that a  
11      person at the residence of Dynadot's CEO "was very combative and would not answer  
12      the server's questions." Service at this address thus did not occur. A true and correct copy  
13      of the email that I received from the process server is attached herein as **Exhibit J at 1**.

14          11.      On September 13, 2022, I received from the second process server  
15      confirmation in the form of an affidavit that service of the Court's September 9, 2022,  
16      Order on Manifold Finance, Inc. had been completed on the registered agent site, 651  
17      North Broad St., Suite 201, Middletown DE, 19709, on September 12, 2022, at 12:10 PM  
18      EDT. A true and correct copy of the affidavit is attached herein as **Exhibit K**.

19          12.      On September 13, 2022, notice that the \$10,000 bond had been posted was  
20      filed on the docket. (Doc. No. 21.).

21                I declare under penalty of perjury under the laws of the United States that the  
22      foregoing is true and correct.

23      Executed in San Francisco, California, on this 13th day of September 2022.

24                               /s/ Jacob Canter  
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